

**FITAPELLI & SCHAFFER, LLP**

475 Park Avenue South, 12<sup>th</sup> Floor

New York, New York 10016

Telephone: (212) 300-0375

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**LUIS ESPINOZA and EUDOXIO ADAN IGLESIAS, on  
behalf of themselves and all others similarly situated,**

**Plaintiffs,**

**13 Civ. 1727 (FB)(RML)**

**-against-**

**WANRONG TRADING CORP., YI ANG SHAO, and  
XIANG QI CHEN,**

**Defendants.**

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
SETTLEMENT, CONDITIONAL CERTIFICATION OF THE SETTLEMENT CLASS,  
APPOINTMENT OF PLAINTIFFS' COUNSEL AS CLASS COUNSEL, AND  
APPROVAL OF THE PROPOSED NOTICE OF SETTLEMENT  
AND CLASS ACTION PROCEDURE**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of the Settlement Class, Appointment of Plaintiffs' Counsel as Class Counsel, and Approval of the Proposed Notice of Settlement and Class Action Settlement Procedure ("Motion for Preliminary Approval") and in the Declaration of Brian S. Schaffer in Support of Plaintiffs' Motion for Preliminary Approval (the "Schaffer Declaration"), Plaintiffs respectfully request that the Court enter an Order:

(1) granting preliminary approval of the Joint Settlement Agreement and Release ("Settlement Agreement"), attached as **Exhibit A** to the Schaffer Declaration;

(2) conditionally certifying the following settlement class under Federal Rule of Civil Procedure 23(a) and (b)(3) for purposes of effectuating the settlement:

All individuals working at Wanrong Trading Corp. (“Wanrong”) between April 1, 2007 and July 24, 2014 as delivery workers, loaders, stockpersons, processors, assemblers, and similarly situated employees (including workers performing meat processing, packing, cleaning, and office work).

(3) appointing Fitapelli & Schaffer, LLP as class counsel;

(4) approving Plaintiffs’ proposed Notice of Proposed Settlement of Class Action Lawsuit Regarding Wages that will be mailed to Class Members, attached as **Exhibit B** to the Schaffer Declaration, and directing its distribution;

(5) approving Plaintiffs’ proposed Notice of Proposed Settlement of Class Action Lawsuit Regarding Wages that will be published in Spanish and Mandarin language newspapers, attached as **Exhibit C** to the Schaffer Declaration, and directing its publication;

(6) approving Plaintiffs’ proposed schedule for final settlement approval; and

(7) granting such other, further, or different relief as the Court deems just and proper.

\* \* \*

Plaintiffs have contemporaneously submitted a Proposed Order, attached as **Exhibit D** to the Schaffer Declaration, for the Court’s convenience.

Dated: New York, New York  
July 28, 2014

Respectfully submitted,

/s/ Brian S. Schaffer

Brian S. Schaffer

**FITAPELLI & SCHAFFER, LLP**

Joseph A. Fitapelli

Brian S. Schaffer

Eric J. Gitig

475 Park Avenue South, 12<sup>th</sup> Floor

New York, New York 10016

Telephone: (212) 300-0375

*Attorneys for Plaintiffs and  
the putative class*